

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Lifeline and Link Up Reform and Modernization	)	WC Docket No. 11-42
	)	
Federal-State Joint Board on Universal Service	)	CC Docket No. 96-45
	)	
Lifeline and Link Up	)	WC Docket No. 03-109
_____	)	

**COMMENTS OF THE ALASKA TELEPHONE ASSOCIATION**

The Alaska Telephone Association (“ATA”)<sup>1</sup> offers these comments to assist the Federal Communications Commission (“FCC” or “Commission”) as it endeavors to reform the Lifeline/Link-Up program. Once again trumpeting the elimination of waste, fraud and abuse, the Commission seems more focused on industry as the culprit, while the rules and customers might share much of the responsibility for the increase in the Low Income Universal Service Fund. Perhaps the demand increase is even indicative of efforts by industry to execute the mandatory advertising of the service as well as a reflection of the recent economic environment.

We appreciate that the Commission has correctly identified marketplace developments as a contributor.<sup>2</sup> The explosive adoption of mobile devices has certainly increased by multiples the number of telephone subscribers including low income telephone subscribers and we believe

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<sup>1</sup>The Alaska Telephone Association is a trade association open to incumbent local exchange carriers, competitive local exchange carriers and interexchange carriers serving the state. Its active members are Adak Telephone Utility; Alaska Power & Telephone Company; Arctic Slope Telephone Association Cooperative; Bristol Bay Telephone Cooperative, Inc.; Bush-Tell, Inc.; Copper Valley Telephone Cooperative, Inc.; Cordova Telephone Cooperative; KPU Telecommunications; Matanuska Telephone Association; Nushagak Cooperative, Inc.; OTZ Telephone Cooperative, Inc.; Summit Telephone Company, Inc.; TelAlaska, Inc.; United Utilities, Inc.; and Yukon Telephone Company, Inc.

<sup>2</sup> NPRM ¶46

that the expectation for ready access to telecommunication service has evolved with that adoption. In restricting Lifeline support to one handset per residential address, policymakers are viewing corrective action from an antiquated perspective where a black telephone sits on a small table in the hallway or hangs on a kitchen wall. The Commission should consider the intent of the Lifeline program as it seeks to introduce reforms.

With the prevalence of mobile telephones (or a single mobile telephone) in low income households, the limitation of support to one subscription per household limits either the aspect of mobility or the proximity of the unit to all household members. If low income universal service support was (or is) intended to offer less affluent members of the population comparable access to telecommunications service, certainly support should be available for more than one subscription per household. We think this marketplace evolution merits consideration as the Commission weighs Lifeline support. Perhaps the current level of support is not waste.

Eligibility rules have presented some challenges as they have attempted to focus on a specific population base and permit a variety of state eligibility criteria while not being so burdensome as to turn away the intended beneficiaries. A party, individual or carrier, can perpetuate fraud by being disingenuous and we would agree that doing so would be an abuse of the program. However, we wonder if the Commission is declaring abuse where the rules are less than clear or no firm controls have been put in place.

We disagree with the proposal that support should be limited to one subscription per residential address as there is no exception for more than one family (household) using that address. In Alaska, and probably in a disproportionate percentage of low income households throughout the nation, multi-generational families use the same address. Low income workers (roommates) sharing a housing unit would be permitted only one supported service. Would it be

abuse (or fraud) of the program if one roommate used a post office box for an address to preclude two subscriptions being identified as using the same residence?

We do not support any proposal that faults a carrier for an abuse of the Lifeline program perpetuated by a customer. As industry members have already counseled the Commission, a central Lifeline eligibility data base would be necessary to prevent otherwise-qualified customers from receiving supported service from multiple carriers.<sup>3</sup> Further, we do not support any rules requiring a carrier to enquire of other carriers to determine if a customer is making a fraudulent application for Lifeline support. And finally, we remind the Commission that as it moves to “improve audits of the program,” these audits are part of the corporate expenses for which the Commission has proposed eliminating high cost support in another docket.

We understand that we have not proposed solutions to the concerns raised by the Commission in this NPRM, however we hope we have identified a few of the issues that should be contemplated. We think a first step is to identify the public policy intent of the program.

Respectfully submitted this 21st day of April, 2011.

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<sup>3</sup> Ex parte, *Lifeline and Link Up Reform and Modernization*, WC Docket No. 11-42; *Federal State Joint Board on Universal Service*, CC Docket No. 96-45; *Lifeline and Link Up*, WC Docket No. 03-109. United States Telecom Association; AT&T; Cox Communications, Inc., Nexus Communications, Inc.; Tracfone Wireless, Inc.; CTIA; CenturyLink; General Communications, Inc.; Sprint Nextel Corp.; Verizon Communications, Inc.; April 15, 2011.